

RANDAZZA LEGAL GROUP, PLLC
Ronald D. Green (NV Bar No. 7360)
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
Tel: 702-420-2001
ecf@randazza.com
Attorney for Judgment Creditor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

In re:

MARC JOHN RANDAZZA,
Debtor.

MARC JOHN RANDAZZA, an individual,
Plaintiff,

v.

CRYSTAL L. COX, an individual,
Defendant.

Case No.: BK-S-15-14956-abl
Chapter 11

Adv. No. 16-1111-abl

***EX-PARTE* MOTION TO REOPEN
CASE FOR JUDGMENT CREDITOR
TO OBTAIN ORDER PURSUANT TO
NRS 21.310**

EX-PARTE MOTION TO REOPEN CASE FOR
JUDGMENT CREDITOR TO OBTAIN ORDER PURSUANT TO NRS 21.310

The above-entitled adversary proceeding was closed on October 17, 2018 following the closure of an appeal filed by the Defendant Crystal Cox. (*See* Adv. ECF 79). Thereafter, the Court issued a writ of execution against the Defendant on August 2, 2019. (*See* Adv. ECF 85). That writ of execution has not been satisfied and Mr. Randazza, as judgment creditor, seeks to reopen this case in order to move this Court for an order pursuant to NRS 21.310 to reach certain property and interests of Ms. Cox that cannot be seized by the writ of execution. That motion will be filed under separate cover upon entry of an Order re-opening the adversary proceeding.

WHEREFORE Mr. Randazza hereby moves the court for an order reopening this case to obtain the order. Submitted with this motion is the filing fee required by 28 U.S.C. § 1930(b) for reopening the case.

Dated: January 8, 2021.

Respectfully submitted,

/s/ Ronald D. Green

Ronald D. Green (NV. Bar No. 7360)
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
<ecf@randazza.com>

Attorney for Judgment Creditor

CERTIFICATE OF SERVICE

On January 8, 2021, I served the foregoing document by the following means to the persons as listed below:

I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

<savvybroker@yahoo.com>
<crystal@crystalcox.com>
<ReverendCrystalCox@gmail.com>

Additionally, I caused the document(s) to be sent to the persons at the addresses listed below via United States mail, postage fully prepaid:

CRYSTAL L. COX
C/O ELIOT BERNSTEIN
2753 NORTHWEST 34TH STREET,
BOCA RATON, FL 33434

CRYSTAL L. COX
P.O. BOX 2027
PORT TOWNSEND, WA 98368

Crystal L. Cox
1000 DRUMLIN LANE
PO BOX 1610
EUREKA, MT 59917

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 8, 2021.

/s/ Trey A. Rothell
Employee,
Randazza Legal Group, PLLC